

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ALLIANCE FOR AUTOMOTIVE)	
INNOVATION,)	
)	C.A. No. 1:20-cv-12090-DPW
Plaintiff,)	Judge Douglas P. Woodlock
)	
vs.)	
)	
MAURA HEALEY, ATTORNEY)	
GENERAL OF THE COMMONWEALTH)	
OF MASSACHUSETTS)	
in her official capacity,)	
)	
Defendant.)	

**NON-PARTY AUTO CARE ASSOCIATION'S
MOTION FOR A PROTECTIVE ORDER**

Pursuant to Fed. R. Civ. P. 26(c) and Local Rule 37.1, Non-Party Auto Care Association hereby submits, by and through the undersigned counsel, its motion for protective order regarding the January 11, 2023 30(b)(6) deposition subpoena served by Plaintiff Alliance for Automotive Innovation.

WHEREFORE, Auto Care Association respectfully requests that the Court enter a protective order regarding the Alliance for Automotive Innovation's 30(b)(6) subpoena to Auto Care Association.

Dated: Chicago, Illinois
February 1, 2023

Respectfully submitted,

THOMPSON HINE LLP

By: /s/ Steven A. Block
Steven A. Block (*pro hac vice*)
20 N. Clark Street, Suite 3200
Chicago, IL 60602
Tel.: 312.998.4200
Steven.Block@ThompsonHine.com

David A. Wilson, BBO No. 552388
1919 M Street, NW
Washington, DC 20036
Tel.: 202.331.8800
David.Wilson@ThompsonHine.com

Karim Sabbidine, BBO No. 699060
335 Madison Avenue, 12th Floor
New York, New York 10017-4611
Tel.: 212.344.5680
Karim.Sabbidine@ThompsonHine.com

Attorneys for Non-Party Auto Care Association

LOCAL RULE 7.1(A)(2) AND 37.1 CERTIFICATION

I, Steven A. Block, counsel for Non-Party Auto Care Association, hereby certifies that on January 27 and 30, 2023, the parties conferred with respect to the relief requested in this motion through emailed correspondence and attempted in good faith to resolve or narrow the issues but were unable to do so.

/s/ Steven A. Block

Steven A. Block (admitted *pro hac vice*)

CERTIFICATE OF SERVICE

I, Steven A. Block, hereby certify that on this date, February 1, 2023, this document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Steven A. Block
Steven A. Block (admitted *pro hac vice*)